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*Attorney for Plaintiffs Laura A. Gaddy,
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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

**LAURA A. GADDY, LYLE D.
SMALL, LEANNE R. HARRIS,**
individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

**[The] CORPORATION OF THE
PRESIDENT OF THE CHURCH OF
JESUS CHRIST OF LATTER-DAY
SAINTS,** a Utah corporation sole
and DOES 1-50

Defendant

**ERRATA TO
PROPOSED THIRD
AMENDED COMPLAINT**

(Dkt 135-2)

2:19-cv-00554-RJS-DBP

Chief Judge: Robert J. Shelby

Chief Magistrate Judge: Dustin B.

Peard

The following are errors in Exhibit 135-2, now filed as an Errata to that Exhibit.

¶ 213a Should be inserted under the Second Cause of Action and should read.

¶ "213a Plaintiffs incorporate paragraphs 1-213 above as though fully set forth herein."

¶ 219 should read:

"Plaintiffs hereby incorporate paragraphs 1-218 above as though fully set forth herein."

The "Prayer for Relief," although referenced in the body of the pleading, was omitted from Dkt 135-2. It should be at the end, just before the Jury Demand.

PRAYER FOR RELIEF

232. WHEREFORE, Plaintiffs GADDY, SMALL and HARRIS, individually and on behalf of the potential class, pray for the following judgment:

233. An order certifying the Class as defined above, appointing Plaintiffs LAURA A. GADDY, LYLE D. SMALL and LEANNE R. HARRIS, Class representatives should that class be certified, and appointing their attorney, Kay Burningham, as Class Counsel; and

234. An award of special damages in the actual out-of-pocket monetary loss in the sum of the amount that Plaintiffs and each class member has paid in tithing, donations to the Church (except for fast offering donations), tuition at LDS colleges and/or universities, mission expense paid individually and for their children or others, and the value of lost opportunities over the course of their affiliation with the LDS Church; and,

235. An award of special damages for the time each class member spent on his or her mission and MTC at the U.S. minimum wage rate during the time of that service, for at least 75 hours per week; and,

236. Attorneys' fees and litigation expenses as items of special damages; and,

238. General damages, including damages for emotional distress, and

239. Punitive damages for the common law fraud-based claims; and,

240. An award of reasonable attorneys' fees and non-taxable costs to be paid out of the common fund prayed for above; and,

241. For prejudgment interest on all damages fixed as of a particular time and [that] can be calculated with mathematical accuracy, which includes tithing, and out-of-pocket expenses; and,

242. For post judgment interest at the judicial rate; and,

243. For such other and further relief that the Court may deem reasonable and proper.

Dated: April 26, 2023

/s/ Kay Burningham

Kay Burningham, Attorney at Law

Counsel for Plaintiffs Lara Gaddy, Lyle Small and Leanne Harris.